



UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

DANIEL E. DOW,

Plaintiff

vs.

BANK OF AMERICA CORPORATION
[BoA] and David Leitch in his capacity of
General Counsel ~ PRLAP INC. / Prlap Inc;
and [FNMA] FEDERAL NATIONAL
MORTGAGE ASSOCIATION, and
Timothy J. Mayopoulous in his capacity of
General Counsel; *et al*,

Defendants

CASE No. 3:16-cv-05235-RBL

FIRST AMENDED COMPLAINT

Cause: 18: 1961 Racketeering | RICO Act

Jurisdiction: Diversity

REMOVAL ANY-ALL CLOUDS: IE,

QUIET TITLE

[SEE EX 15, "CONFLICTS"]

JURY TRIAL IS DEMANDED

A. IFP form w/copy of the letter, WILLIAM M. MCCOOL, Clerk and CONFLICT/S;

B. ORDER w/copy of letter, Joseph Whiteley, Deputy Clerk In Charge;

C. ORDER, Fibre Federal Cashier's Check (see Exhibit 4, 3:16-cv-05235-RBL);

D. BANK OF AMERICA, Notice Date: March 30, 2016;

E. seterus, notification dated April 4, 2016;

F. WASHINGTON STATE BAR ASSOCIATION GRIEVANCE AGAINST A LAWYER

w/copy of letter, Robert W. McDonald, QUALITY LOAN SERVICE CORP, WA;

FIRST AMENDED COMPLAINT

A. The form IFP is submitted to the Court in respect to Mr. McCool's letter, and

P 1-3, Daniel E. DOW, 631 So. Goble Creek Rd., Kelso, WA 98626, T 360-747-0778

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Case # 3:16-cv-05235-RBL

in honor of the Constitutions, United States and State of Washington and therefore, due process, rule of law. 03/28/2016, EX15, COMPLAINT (3:16-cv-05235-RBL) addresses **CONFLICTS OF INTEREST** via Judges, *et al.* Please therefore, may the Court be fully transparent RE *Judge Ronald B. Leighton, et al.*, and the DEFENDANTS' (*ie*, Bank of America, "Fannie Mae", *et al.*). In Forma Pauperis [IFP], demanded causes me serious concern, in the case matter: (1) Bank of America [BoA] did not loan me "money", and when BoA enters the Court represented *via* its attorneys and / or its representatives, the alleged "money" supporting its representation is undisclosed electronic digits. Indeed, there is no IFP required of BoA ... in the United States of America people in the majority are no longer fooled all the time in respect to the fraudulent "money". I, Daniel E. Dow, provided to BoA *et al.*, REAL-LAWFUL MONEY. I have now noticed the Court with Congress Member Peter DeFazio's whistle-blowing "money out of nothing", causing America's "Great Depression" that has clearly destroyed our economy in the global market;

B. ORDER requesting that the check (enclosed), FIBRE FEDERAL CREDIT UNION in the *sum* of \$1,175.00, to be authorized as a deposit of funds in the Court.

C. ORDER demanding the FIBRE FEDERAL CREDIT UNION check in the *sum* of \$1,180.00, to be submitted in the Court as an authorized deposit of funds in this case matter;

D. BoA, letter to I, Daniel E. Dow, (copy of letter enclosed). Unfortunately Global General Counsel David Leitch, continues to ignore my DEMANDS. Mr. Leitch, *et al.*, now copied:

FIRST AMENDED COMPLAINT (attachments not included);

E. seterus continues to violate the law in alleging the entity/ies have standing;

F. The Washington State B.A.R. [WSBA] forwarded to me the form which I have included for submission in this FIRST AMENDED COMPLAINT: (1) Attorney (Esq.) Robert W. Mc

P 2-3, Daniel E. DOW, 631 So. Goble Creek Rd., Kelso, WA 98626, T 360-747-0778

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Donald, continues to obfuscate, (2) MY DEMAND is to know “Quality Loan”, as the/a representative for *whom*? BoA?!; (3) My research of “servicers” and / or “loan companies” (ie *Quality Loan, Quality Loan of Washington*) that misrepresent standing (*seterus, et al*), exposes BoA as one of the largest “banks” sharing more than \$747 trillion in assets— clearly — PONZI unjust enrichment *via* mercenaries fraudulently abusing the Court system in criminal— *financial terrorism. IE, fraudclosures!*

I, DANIEL E. DOW, hereby request the Court to DEMAND (please correspond) A COURT ORDER: TO COMPEL PRODUCTION OF, BUT NOT LIMITED TO, the **ORIGINAL PROMISSORY NOTE (IE, MY BLUE INK WET SIGNATURE)**, that was signed at the CLOSING of the alleged BoA loan.

Further, in the copy/ies which BLANK | ROME forwarded to me, there is an Officer of Bank of America that signed the **NOTE**:

WILLIAM CRAIG, ASSISTANT VICE PRESIDENT.

Please an ORDER from the Court to attach a lien against the bond of Mr. William Craig, in his signature *via Seal*. I am confident that his bond can cover the Court’s costs.

Respectfully, April 12, 2016,


DANIEL E. DOW

copy/ies to: **James C. Duff**,
Chief Administrative Officer
U.S. Courts | Judicial Conference USA
One Columbus Circle NE
Washington, D.C. 20544

F 973-695-1414
SAME, Chief Executive Officer
Freedom Forum, Inc, Corp Headquarters
1101 Wilson Blvd., Arlington, VA 22209-2281
T 703-526-0800; & 555 Pennsylvania Ave.
Washington, D.C. 20001

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CASE No. 3:16-cv-05235-RBL

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Case # 3:16-cv-05235-RBL

UNITED STATES DISTRICT COURT FOR THE
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DANIEL E. DOW,

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MORTGAGE ASSOCIATION, and
Timothy J. Mayopoulous in his capacity of
General Counsel; *et al*,

Defendants

CASE No. 3:16-cv-05235-RBL

ORDER

JURY TRIAL IS DEMANDED

It is hereby ORDERED, FIBRE FEDERAL CREDIT UNION Cashier's Check in
in the amount of One Thousand One Hundred and Seventy Five Dollars (\$1,175.00), as an
authorized deposit of funds in the Court, DATED this ____ day of April, 2016,

United States District Court Judge, for the
Western Division, State of Washington

(Enclosure, Fibre Federal Credit Union Cashier's Check, \$1,175.00)

P 1-1, Daniel E. DOW, 631 So. Goble Creek Rd., Kelso, WA 98626, T 360-747-0778

CASE No. 3:16-cv-05235-RBL

First Amended Complaint (B)

Case # 3:16-cv-05235-RBL



UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
OFFICE OF THE CLERK
U.S. COURTHOUSE
1717 PACIFIC AVE., ROOM 3100
TACOMA, WASHINGTON 98402
(253) 882-3800

WILLIAM M. MCCOOL
District Court Executive
Clerk of Court

JOE WHITELEY
Deputy in Charge

March 31, 2016

DANIEL E. DOW
631 S GOBLE CREEK RD
KELSO WA 98626-8913

RE: Return of Fibre Federal Cashier Check No. 1000117487 for \$1,175.00.

The Clerk's office received your case documents and the Fibre Federal Cashier Check, No. 1000117487 for \$1,175.00. The case number assigned to your case is C'16-5235-RBL. The Cashier Check is returned to you due to the fact that the Clerk's Office does not have an order authorizing the deposit of funds with the Court. All registry funds must have a case filed and an order from the judge allowing the deposit of funds into the registry of the Court.

Sincerely,

Joseph Whiteley
Deputy Clerk In Charge.
Tacoma Division Office
U.S. District Court
1717 Pacific Ave, Rm 3100
Tacoma WA 98402-3200

*First Amended
Complaint*

(B.)

Case # 3:16-cv-05235-RBL

UNITED STATES DISTRICT COURT FOR THE
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DANIEL E. DOW,

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vs.

BANK OF AMERICA CORPORATION
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MORTGAGE ASSOCIATION, and
Timothy J. Mayopoulous in his capacity of
General Counsel; *et al*,

Defendants

CASE No. 3:16-cv-05235-RBL

ORDER

JURY TRIAL IS DEMANDED

It is hereby ORDERED, FIBRE FEDERAL CREDIT UNION Cashier's Check in
in the amount of One Thousand One Hundred and Eighty Dollars (\$1,180.00), as an
authorized deposit of funds in the Court, DATED this ____ day of April, 2016,

United States District Court Judge, for the
Western Division, State of Washington

(Enclosure, Fibre Federal Credit Union Cashier's Check, No. 1000131673 ~ \$1,180.00)

P 1-1, Daniel E. DOW, 631 So. Goble Creek Rd., Kelso, WA 98626, T 360-747-0778

CASE No. 3:16-cv-05235-RBL

First Amended
Complaint Case # 3:16-cv-05235-RBL

0000758415 DOW,DANIEL Transaction Summary

Post Date	ID	Eff Date	Transaction	Trans Amt	Balance	Chg	Int/Pnly	Fees	New Balance	Description	Prev Available
04/11/2016	S 0090	04/11/2016	Check 00 1000131673 Disbursed	1,180.00	-1,180.00	0.00	0.00	0.00	811.78		1,961.88
04/11/2016	S 0090	04/11/2016	STOP PAY CC CK#1000111985	1,800.00	1,800.00	0.00	0.00	0.00	1,981.78		161.88
04/11/2016	S 0090	04/11/2016	Withdrawal	20.00	-20.00	0.00	0.00	0.00	191.78		181.88

04/11/2016



Fibre Federal Credit Union
Main Operations
822 Commerce Ave
Longview WA 98632
Inquiries Call:

360-423-8750

Acct XXXXX8415 DOW,DANIEL
EFF: 04/11/16 Date: 04/11/16
TIC: 2049 12:36pm

Withdraw from CHOICE CHECKING ACCT &
0090
Prev Bal: 211.78
Amount: 20.00
New Bal: 191.78
Seq: #181917

Comment for CHOICE CHECKING ACCT 0090
STOP PAYMENT FEE/758415
Seq: #181914

Acct XXXXX8415
Avail Bal 80090
STOP PAYMENT FEE/758415
000131-0000 STOP PAYMENT FEE
-20.00

First Amended
Complaint

Bank of America**Home Loans**

Customer Service Department
P.O. Box 31785
Tampa, FL 33631-3785

Notice Date: March 30, 2016**Loan No.:** 870500496**Property Address:**
631 S Goble Creek Rd
Kelso, WA 98626

Daniel E Dow
631 S Goble Creek Rd
Kelso, WA 98626

IMPORTANT MESSAGE ABOUT YOUR HOME LOAN

Several inquiries regarding your above referenced loan have recently been received. This notice serves as a reply to each of them.

WHAT YOU NEED TO KNOW

We regret that you were dissatisfied with the loan transaction with Bank of America, N.A. However, Bank of America, N.A.'s response dated March 2, 2016 sufficiently states Bank of America, N.A.'s position regarding this matter. We feel that Bank of America, N.A. has been responsive and thorough and that we have responded to all the questions raised in your previous letter.

Upon further review, there is nothing to add to the previous response and our position remains unchanged. The loan remains in full force and effect and we will continue to service the loan in accordance with the valid, binding loan documents that our customer signed.

We hope that we have clearly conveyed Bank of America, N.A.'s position regarding this matter.

If you have questions regarding this letter or additional information to provide, mail your correspondence to the following address:

Bank of America, N.A.
Customer Service Department
P.O. Box 31785
Tampa, FL 33631-3785

QUESTIONS?

If you have any questions, please call us at (800) 669-6607 between the hours of Monday-Friday 7a.m. to 7p.m. Local Time. We appreciate the opportunity to serve your home loan needs.

This communication is from Bank of America, N.A., the servicer of your home loan.

*First Amended
Complaint*

D.
Case # 3:16-cv-05235-RBL

seterus
PO Box 1077; Hartford, CT 06143-1077

Business Hours (Pacific Time)
Monday-Thursday 5 a.m. to 8 p.m.
Friday 5 a.m. to 6 p.m.

Physical Address
14523 SW Millikan Way; Suite 200; Beaverton, OR 97005

Payments
PO Box 54420; Los Angeles, CA 90054-0420

Correspondence
PO Box 1077; Hartford, CT 06143-1077

Phone 866.570.5277
Fax 866.578.5277
www.seterus.com

000234

DOW, DANIEL E
631 S GOBLE CREEK RD
KELSO, WA 98626

L925AA.1

April 4, 2016
Loan number: 26932531
Serviced by Seterus, Inc.

RE: 631 S GOBLE CREEK RD
KELSO, WA 98626-8913

Dear DOW, DANIEL E:

This notification is for informational purposes only.

There has been a change to your escrow account. If a change occurs to your required escrow payment, you will receive an escrow account analysis statement at least 30 days prior to such a change.

If you have any questions, please contact us at 866.570.5277. For borrowers having difficulty making their payments, we have loan specialists available Monday-Thursday 5 a.m. to 9 p.m., Friday 5 a.m. to 6 p.m., and Saturday 9 a.m. to 12 p.m. (Pacific time). Saturday hours may vary.

Sincerely,

Seterus, Inc.

THIS COMMUNICATION IS FROM A DEBT COLLECTOR AS WE SOMETIMES ACT AS A DEBT COLLECTOR. WE ARE ATTEMPTING TO COLLECT A DEBT AND ANY INFORMATION OBTAINED WILL BE USED FOR THAT PURPOSE. HOWEVER, IF YOU ARE IN BANKRUPTCY OR RECEIVED A BANKRUPTCY DISCHARGE OF THIS DEBT, THIS LETTER IS NOT AN ATTEMPT TO COLLECT THE DEBT, BUT NOTICE OF POSSIBLE ENFORCEMENT OF OUR LIEN AGAINST THE COLLATERAL PROPERTY. COLORADO: FOR INFORMATION ABOUT THE COLORADO FAIR DEBT COLLECTION PRACTICES ACT, SEE WWW.COLORADOATTORNEYGENERAL.GOV/CA. Seterus, Inc. maintains a local office at 355 Union Boulevard, Suite 250, Lakewood, CO 80228. The office's phone number is 888.738.5576. NEW YORK CITY: 1411669, 1411665, 1411662. TENNESSEE: This collection agency is licensed by the Collection Service Board of the Department of Commerce and Insurance. Seterus, Inc. is licensed to do business at 14523 SW Millikan Way, Beaverton, OR.

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WASHINGTON STATE BAR ASSOCIATION GRIEVANCE AGAINST A LAWYER

Mail to:
**OFFICE OF
DISCIPLINARY COUNSEL
WASHINGTON STATE
BAR ASSOCIATION**
1325 Fourth Ave, Ste 600
Seattle, WA 98101-2539

GENERAL INSTRUCTIONS

- Read our information sheet *Lawyer Discipline in Washington* before you complete this form.
- If you have a disability or need assistance with filing a grievance, call us at 206-727-8207. We will take reasonable steps to accommodate you.
- If you are having problems communicating with your lawyer, please consider contacting Consumer Affairs at 206-727-8207 before filing a grievance. Se habla Español.
- You can also file your grievance online <http://www.wsba.org/Licensing-and-Lawyer-Conduct/Discipline/File-a-Complaint-Against-a-Lawyer>.

INFORMATION ABOUT YOU

☒ Mr. ☐ Ms.

Name DANIEL EDWARD DOW
First Middle Last

Street Address or POB 631 S. GOBLE CR RD

City KELSO State WA Zip Code 98626

Phone Number (360) 747-0778 Ext Email Address JSTEWART52008@GMAIL.COM

INFORMATION ABOUT THE LAWYER

(We cannot accept grievances against law firms or associations. You must specifically name the lawyer against whom you are filing your grievance and a separate grievance form should be completed for each lawyer.)

Name Robert W. McDonald
First Middle Last

Bar Number (If known) WSBA 43842

Street Address or POB 108 1st Ave., South, Suite 202

City Seattle State WA Zip Code 98104

Phone Number (206) 319-9054 Email Address

*First Amended
Complaint*

INFORMATION ABOUT YOUR GRIEVANCEDescribe **your** relationship to the lawyer who is the subject of your grievance:☐ I am a client☐ I am an opposing lawyer☐ I am a former client☒ Other: See Attached☐ I am an opposing partyIs your grievance about conduct in a court case? Yes ☒ No ☐If yes, what is the case name, file number, and court name? (for example, *Smith v. Jones, Case No. 12-3-45678-9, King County Superior Court*) FULL DISCLOSURE, RE PRLAP, INC.Case No: 3:16-CV-05235-RBL

Explain your grievance in **your own words**. Give all important dates, times, and places. Attach no more than 25 additional pages, including exhibits. Attach **copies (not your originals)** of any relevant documents. Please do not bind or highlight your documents. We will scan and then destroy the documents you submit. Also note that we will not accept cassette tapes, disks, flash drives, or other electronic recordings with your grievance unless you provide a written transcript.

(1) In my research, "Quality Loan Service Corp., et al," are in actuality the/a "Banks" as a "blockade" to the United States' Courts' resolution process. (2) PRLAP, Inc. is clouding the title of my property (as also, Bank of America and Federal National Mortgage Association "Fannie Mae", et al). (3) I have requested ANY-ALL "services" (eg seterus, inc) and "Loan Service Corporations" (Quality Loan of Washington) to be fully transparent in the COURT—so that, the Judge can honor the CONSTITUTIONS (U.S. and WA state) due process and the rule of law. TRUSTEE/S and/or ORIGINAL BENEFICIARY/IES ??

AFFIRMATION

I affirm that the information I am providing is true and accurate to the best of my knowledge. I have read Lawyer Discipline in Washington and I understand that all information that I submit can be disclosed to the lawyer I am complaining about and others.

Signature: Date: 4-12-16

DANIEL E. DOW

631 So. Goble Creek Rd., Kelso, WA 98626-8913

T (360) 747-0778, jstewart52008@gmail.com

March 23, 2016

TO

F 973-695-1414, T 703-528-0800

James C. Duff, Chief Executive Officer [CEO]

Chief Administrative Officer

U.S. courts

One Columbus Circle NE

Washington DC 20544

Freedom Forum, Inc.

Corp. Headquarters, 1101 Wilson Blvd.,

Arlington, VA 22209-2281, and

555 Pennsylvania Ave., N.W.

Washington, D.C. 20001

F 240-699-3893, FNMA, (*Fannie Mae*)

Timothy J. Mayopoulos, General Counsel

Federal National Mortgage Association

3900 Wisconsin Ave, NW

Washington, DC 20016

F 302-655-5049

David Leitch, Global (General) Counsel

BANK OF AMERICA CORP [BoA]

214 North Tyron St

Charlotte, N.C. 28255

F 206-262-2046

Federal Bureau of Investigation

RE: Financial Terrorism

[*IE* CDO/s | BTO/s]

1110 Third Ave

Seattle, WA 98101

T 914-421-1200

Director

Center for Judicial Accountability (CJA)

cja@judgewatch.org

Post Office Box 8101

White Plains, New York 10602

F 360-705-3518

Richard DeBolt, Representative

State of Washington

417 John L. O'Brien Bldg.

POB 40600

Olympia, WA 98504-0600

F 360-695-6197

Jaime H. Beutler, 3RD District

U.S. Representative, WA state

General O.O. House

750 Anderson St., "B"

Vancouver, WA 98661

Chief Administrative Officer | U.S. courts, Mr. James C. Duff ~ and CEO | Freedom Forum, Inc., *ET AL*: Please receive March 9, 2016, letter, also now served on the "Original Trustee" – **PRLAP, INC.** (Quality Loan Service Corp. Of Washington), 108 1ST Ave., So., Ste 202, Seattle, WA 98104, T (866) 925-0241, F 206-257-3163, Robert W. McDonald, WSBA #43842; and, 401 N. Tyron St., Charlotte, N.C. 28202-2196 ~BANK OF AMERICA/PRLAP, INC./Quality Loan Svc! As you must know, in 2008, **Collateral Debt Obligations** [CDO/s] as *Financial Terrorism* collapsed the U.S. economy. The global market rejected Wall Street's CDO/s. Wall Street [*IE* "FED/Fed"] forced to keep ITS' CDO/s is again attempting to sell the *fraudulent wealth* to the global market: **Bespoke Tranche Opportunities** [BTO/s]. BTO/s are the *Fed's Wall Street Financial Terrorism on steroids*. According to my understanding, unfortunately we can expect another *bubble bursting* (*ie*, further financial collapse). My COMPLAINT regarding this matter, includes my 03/09/2016, letter (and this letter) in my EXHIBITS. I have been communicating with you about filing in the United States District Court [USDC], in Tacoma, WA. The debt bubble no doubt includes the innumerable "lawyers" who were sold *via* Wall Street, "future retirement abundance". Please also see A. <http://livinglieswordpress.com/2016/03/21/what-the-media-is-missing-about-the-securitization-of-mortgage-loans/>; and B. <http://livinglieswordpress.com>. Thank you,

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Daniel E. Dow, 03/23/2016

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108 1st Ave South, Suite 202 • Seattle, Washington 98104 • (866) 925-0241

April 5, 2016

Daniel E. Dow
631 So. Goble Creek Rd.
Kelso, WA 98626-8913

Our File No.: Unknown

Property: 631 So. Goble Creek Rd. Kelso, WA 98626-8913

Dear Mr. Dow:

Please be advised the Trustee has reviewed their records for a second time and is again unable to locate an active foreclosure file for the subject property. Please contact my office at your convenience to discuss your issue. My direct line is (206) 319-9054. Thank you in advance.

Sincerely,

A handwritten signature in black ink, appearing to read "R. McDonald".

Robert W. McDonald, Esq.

General Counsel

Quality Loan Service Corp. of Washington

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